

1 PAUL L. REIN, ESQ. (State Bar No. 43053)
2 AARON M. CLEFTON (State Bar No. 318680)
REIN & CLEFTON, Attorneys at Law
200 Lakeside Drive, Suite A
3 Oakland, CA 94612
Telephone: (510) 832-5001
4 Facsimile: (510) 832-4787
info@reincleftonlaw.com

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6 Attorneys for Plaintiff
JOHN SCHULZ

7
8 FOLGER LEVIN LLP
Jiyun Cameron Lee (CSB No. 161667, jlee@folgerlevin.com)
Marie Jonas (CSB No. 278952, mjonas@folgerlevin.com)
9 199 Fremont Street, 20th Floor San Francisco, CA 94105
Telephone: 415.625.1050
10 Facsimile: 415.625.1091

11 Attorneys for Defendants
12 METROPOLITAN TRANSPORTATION
COMMISSION and CITY AND
COUNTY OF SAN FRANCISCO

13
14 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

15
16 JOHN SCHULZ,

Case No. 3:19-cv-02134-MMC

17 Plaintiff,

Civil Rights

18 v.

19 METROPOLITAN TRANSPORTATION
COMMISSION; and CITY AND COUNTY OF
20 SAN FRANCISCO

**STIPULATION AND [PROPOSED]
ORDER DISMISSING ENTIRE ACTION
WITH PREJUDICE**

21 Defendants.

22
23 **STIPULATION**

24 Plaintiff JOHN SCHULZ (“Plaintiff”) and Defendants METROPOLITAN
25 TRANSPORTATION COMMISSION; and CITY AND COUNTY OF SAN FRANCISCO
26 (“Defendants”) – Plaintiff and Defendants together the “Parties” – hereby stipulate and request
27 that pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), the above-captioned action be
28 dismissed with prejudice in its entirety. Each side shall pay its own attorneys' fees and costs,

1 except as expressly set forth in a Settlement Agreement between the parties.

2 In accordance with Paragraph 9 of General Order 56, the Parties request that the Court
3 retain jurisdiction to enforce the injunctive relief measures specified in Exhibit A attached hereto.

4 **IT IS SO STIPULATED.**

5 Dated: April 26, 2021

REIN & CLEFTON

/s/ Aaron M. Clefton

By: AARON M. CLEFTON, ESQ.
Attorneys for Plaintiff
JOHN SCHULZ

9 Dated: April 26, 2021

FOLGER LEVIN LLP

/s/ Jiyun Cameron Lee

By: JIYUN CAMERON LEE, ESQ.
Attorneys for Defendants
METROPOLITAN TRANSPORTATION
COMMISSION and CITY AND
COUNTY OF SAN FRANCISCO

13 **FILER'S ATTESTATION**

14 Pursuant to Local Rule 5-1, I hereby attest that on April 26, 2021, I, Aaron Clefton,
15 attorney with Rein & Clefton, received the concurrence of Jiyun Cameron Lee, counsel for
16 Defendants, in the filing of this document.

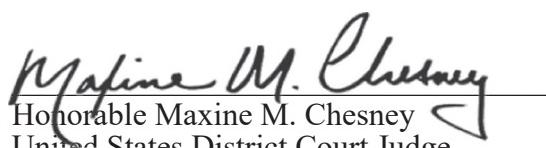
/s/ Aaron M. Clefton
Aaron M. Clefton

19 **[PROPOSED] ORDER**

20 Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.
21 Defendants shall perform the work specified in Exhibit A. The Court shall retain jurisdiction to
22 enforce the work contemplated to be done in Exhibit A and the Parties' separate Settlement
23 Agreement as to monetary terms.

24 **IT IS SO ORDERED.**

26 Dated: June 7, 2021


Honorable Maxine M. Chesney
United States District Court Judge